

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARIA VERGARA, individually and on behalf of a class of similarly situated individuals,

Plaintiff,

 \mathbf{V}_i

UBER TECHNOLOGIES, INC., a Delaware corporation,

Defendant.

No. 15-cv-06942

Hon. Thomas M. Durkin

STIPULATION TO STAY CASE PENDING MEDIATION

Plaintiff, Maria Vergara, and Defendant, Uber Technologies, Inc. (“Uber”), by and through their attorneys, hereby stipulate as follows:

1. WHEREAS Plaintiff initiated this putative class action against Uber on August 7, 2015. (Dkt. 1).
2. WHEREAS Uber filed an Answer to Plaintiff's Class Action Complaint on October 5, 2015. (Dkt. 7).
3. WHEREAS Uber filed a Motion for Judgment on the Pleadings on October 21, 2016 (Dkt. 52), which has been fully briefed as of December 6, 2016. (Dkt. 60).
4. WHEREAS the Parties will be mediating this matter, along with a matter pending in a different court, *Lathrop et al. v. Uber Technologies, Inc.*, 14-cv-05678 (N.D. Cal.), with the Hon. Layn R. Phillips (Ret.), which is anticipated to occur in May 2017.
5. WHEREAS, in the interest of judicial economy and to maximize the opportunity for resolution of this matter, given that there is a possibility that Plaintiff's claims and the claims

of the putative class members may be resolved through mediation, the Parties wish to stay this action, including any resolution of the Motion for Judgment on the Pleadings, pending the outcome of said mediation.

NOW, THEREFORE, the Parties hereby stipulate and request that the Court enter an Order which provides that:

- A) This action is STAYED pending the outcome of the Parties' scheduled mediation;
- B) All deadlines are VACATED until further order of the Court;
- C) The Parties shall notify the Court of the outcome of their mediation within ten (10) days of the mediation.

Dated: March 1, 2017

Respectfully Submitted,

MARIA VERGARA, individually
and on behalf of a class of similarly
situated individuals

By: /s/ Paul T. Geske
One of Plaintiff's Attorneys

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UBER TECHNOLOGIES, INC.

By: /s/ David J. Fioccola
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*Attorneys for Defendant Uber
Technologies, Inc.*

**PURSUANT TO STIPULATION, AND FOR GOOD CAUSE SHOWN,
IT IS SO ORDERED:**

Dated: _____, 2017

Hon. Thomas M. Durkin
U.S. District Court Judge

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2017, I electronically filed the foregoing *Stipulation to Stay Case Pending Mediation* with the Clerk of the Court using the CM/ECF system. A copy of said document will be electronically transmitted to the following counsel of record:

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